

September 5, 2018

VIA ELECTRONIC FILING

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

Re: Applications of T-Mobile US, Inc. and Sprint Corporation, WT Docket No. 18-197

Dear Ms. Dortch,

Consistent with section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, **T-Mobile US, Inc.** submits the attached material as Attachment 1 in support of the proposed transfer of control of Sprint Corporation to T-Mobile US, Inc.

Please feel free to contact me with any questions.

Respectfully submitted,

/s/ Geoffrey Why
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Suite 1600
Boston, MA 02108

cc: (via email)

Chairman Ajit Pai Commissioner Michael O'Rielly Commissioner Brendan Carr Commissioner Jessica Rosenworcel

Boston Business Journal

Viewpoint: T-Mobile merger can help connect the unconnected

By Geoff Why – Counsel at Verrill Dana; advisor to T-Mobile

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In my hyper-connected home, my teenage sons take for granted their ability to access the internet to help them with their homework or advance in their studies. My 13-year old has algebra lessons with his Minnesota-based tutor, who video chats with him every Tuesday night. My 18-year old watches Kahn Academy physics videos to help him answer the unanswerable questions of the universe. Like many, they assume immediate access to the internet is the norm. But many students lack reliable access, like those in rural Western Massachusetts who park outside of libraries with laptops in tow to connect to sporadic Wi-Fi, and the Boston public school youth who must study in noisy coffee shops to access the information superhighway.

The fact is, poor broadband connectivity has created a significant homework gap for many students in Massachusetts. FCC Commissioner Jessica Rosenworcel has noted that "as many as seven in 10 teachers today assign homework online, but the FCC estimates one in three households do not subscribe to broadband service." But help is on the way.

The T-Mobile-Sprint merger can help bridge this digital divide. Wireless networks run on various radio frequencies — also called spectrum — that different companies own. Currently, T-Mobile and Sprint own complementary spectrum bands, which, combined with T-Mobile's competitive pricing, could connect the disconnected. Here's how.

With the combination of T-Mobile's low band (600 MHz) and Sprint's middle band (2.5 GHz) spectrum, the New T-Mobile will accelerate deployment of a 5G network with fiber-like speeds as well as extending outdoor wireless coverage to almost 96 percent of Americans in rural communities. Others are working toward 5G as well, but together, T-Mobile and Sprint have the spectrum to create the first nationwide 5G network. In the coming years, wireless carriers, including the New T-Mobile, will deliver speeds 15 times faster than average broadband speeds of today, making 5G a real substitute for wired broadband.

Affordability is another key ingredient to access. Customers of T-Mobile brands like MetroPCS — a pre-paid wireless brand that offers unlimited plans for as low as \$30 per month to better serve unbanked communities — will benefit from 5G network deployment as well. Like other New T-Mobile users, pre-paid customers will use the same "supercharged" 5G network, leading to cost savings and improvements in network coverage, quality, and speed.

Moreover, a large proportion of cost-conscious customers will be able to use their phones as mobile hotspots to connect to the internet as a substitute for in-home

broadband. Such "cord-cutting" will allow them save money by avoiding the prices that traditional internet providers charge.

The New T-Mobile will also benefit rural Americans. With 600 new stores serving rural areas and small towns, many Americans will benefit from competitive pricing for the first time. The company will also provide in-home fixed broadband with speeds of at least 25/3 Mbps for over 54 million rural residents, giving them options that many urban and suburban residents take for granted.

Bottom line: the merger of T-Mobile and Sprint will result in better connectivity for households and students in Massachusetts and beyond. Because of this new connectivity, more students will be able to access online learning, read digital encyclopedias, connect to e-classrooms, and collaborate on research projects with students around the country.

Geoffrey Why serves as counsel at Verrill Dana and as an advisor to T-Mobile. He served as commissioner of the Massachusetts Department of Telecommunications and Cable from 2009 to 2014.